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Attorney for Defendant Anastasia Popova

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

12 ILIA N. ZAVIALOV, in the right of and for
13 the benefit of DREAM MARRIAGE GROUP,
INC..

Case No: 2:13-cv-02090-JAD-VCF

14 Plaintiff

15 | VS

16 ANASTASIA POPOVA, DOES 1 through
17 50, Inclusive.

18 Defendants.

19

DREAM MARRIAGE GROUP, INC

21 Nominal Party

REQUEST FOR JUDICIAL NOTICE

25 Defendant Anastasia Popova (hereinafter “Defendant”) hereby request that the Court take
26 judicial notice, pursuant to Rule 201 of the Federal Rules of Evidence, of Exhibits 1-6 to the
27 Declaration of Bradley Schrager, Esq., in Support of Defendant’s Motion to Dismiss or, in the
28 Alternative, to Stay on Grounds of Abstention or, in the Alternative, to Transfer on Grounds of

Forum Non Conveniens (“Schrager Dec.”), below. A federal court must take judicial notice of facts “if requested by a party and supplied with the necessary information.” Fed. R. Evid. 201(d).

3 Each of the listed exhibits attached to the Schrager Dec. is in the record of this Court, the
4 Eighth Judicial District (*Ilia Zavialov, in the right of and for the benefit of Dream Marriage*
5 *Group, Inc., v. Anastasia Popova, et al.*, Case No. A-13-6900188-C), the Superior Court of Los
6 Angeles County, California (*In Re Marriage of Popova/Zavialov*, Case No. BD 588 375), the
7 United States District Court for the Central District of California (*Dream Marriage Group, Inc.*
8 *and Dream World Partners, Inc. v. Anastasia Popova, et al.*, Case No. V13-7659SH), or the
9 Superior Court of Clark County, Washington (*In re the Marriage of Ilia Zavialov and Anastasia*
10 *Popova*, Case No. 13-3-02205-0).

11 Federal courts may “take notice of proceedings in other courts, both within and without the
12 federal judicial system, if those proceedings have a direct relation to the matters at issue.” *United*
13 *States ex rel Robinson Rancheria Citizens Council v. Borneo, Inc.*, 971 F.2d 244, 248 (9th Cir.
14 1992).

15 DATED this 5th day of December, 2013.

**WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP**

By: /s/ Bradley Schrager, Esq.
Bradley Schrager, Esq.
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Attorney for Defendant Anastasia Popova

1 DECLARATION OF BRADLEY SCHRAGER
23 I, Bradley Schrager, Esq., under penalty of perjury, declare:
45 I am an attorney with the law firm Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP,
6 counsel for Defendant in the above-captioned action. I make this Declaration in support of
7 Defendant's Motion to Dismiss or, in the Alternative, to Stay on Grounds of Abstention or, in the
8 Alternative, to Transfer on Grounds of *Forum Non Conveniens* filed simultaneously. The facts set
forth below are within my personal knowledge, except as otherwise indicated.9 The documents attached as Exhibits 1-6 hereto, as listed below, are true and correct copies
10 of documents filed in the action *Ilia Zavialov, in the right of and for the benefit of Dream*
11 *Marriage Group, Inc., v. Anastasia Popova, et al.*, No. A-13-6900188-C (Eighth Judicial District)
12 and No. 2:13-cv-02090-JAD-VCF (D. Nev.), *In Re Marriage of Popova/Zavialov*, No. BD 588
13 375 (Superior Court of Los Angeles County, California), *Dream Marriage Group, Inc. and Dream*
14 *World Partners, Inc. v. Anastasia Popova, et al.*, No. V13-7659SH (C.D. Cal.), or *In re the*
15 *Marriage of Ilia Zavialov and Anastasia Popova*, No. 13-3-02205-0 (Superior Court of Clark
County, Washington).

16	<u>Document</u>	<u>Exhibit</u>
17	Plaintiff Ilia N. Zavialov's Verified Complaint (<i>Zavialov</i>) (filed October 15, 2013)	1
18	Defendant Anastasia Popova's Petition for Dissolution of Marriage (<i>In Re Marriage of Popova</i>) (filed September 6, 2013)	2
19	Defendant Anastasia Popova's Request for Order-Control of Company (<i>In Re Marriage of Popova</i>) (filed September 17, 2013)	3
20	Plaintiff Ilia N. Zavialov's C.D. Cal. Complaint (<i>Dream Marriage Group, Inc.</i>) (filed October 16, 2013)	4
21	Plaintiff Ilia N. Zavialov's Petition for Dissolution of Marriage (<i>In Re Marriage of Zavialov</i>) (filed October 18, 2013)	5
22	Superior Court of Los Angeles County, California Tentative Ruling on Plaintiff Ilia N. Zavialov's Motion to Quash Defendant Anastasia Popova's Petition for Dissolution of Marriage	6

1 Defendant Anastasia Popova's Notice of Removal (*Zavialov*)
2 (filed November 11, 2013)

Under penalties of perjury under the laws of the United States of America and the State of Nevada, I declare that the foregoing is true and correct to my own knowledge, except as to those matters stated on information and belief, and that as to such matters I believe to be true.

By 
BRADLEY SCHRAGER, ESQ.

Attorney for Defendant Anastasia Popova